

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

In re:

Jodi Thomas-Shinn,
Debtors.

Case No.: 8:18-bk-04965-CPM
Chapter 13

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MOTION FOR LEAVE TO WITHDRAW AS COUNSEL

NOTICE OF OPPORTUNITY TO OBJECT AND REQUEST FOR HEARING Pursuant to Local Rule 2002-4, the Court will consider the relief requested in this paper without further notice or hearing unless a party in interest files a response within fourteen (14) days from the date set forth on the attached proof of service, plus an additional three days for service if any party was served by U.S. Mail. If you object to the relief requested in this paper, you must file a response with the Clerk of the Court at Sheryl L. Loesch, 801 N. Florida Avenue Suite 555, Tampa, Florida 33602 and serve a copy on the movant's attorney, Keith P. Merritt, 335 Doris Drive, Lakeland, FL 33813, and any other appropriate persons within the time allowed. If you file and serve a response within the time permitted, the Court will either schedule and notify you of a hearing or consider the response and grant or deny the relief requested without a hearing. If you do not file a response within the time permitted, the Court will consider that you do not oppose the relief requested in the paper, will proceed to consider the paper without further notice or hearing, and may grant the relief requested.

COMES NOW, KEITH P. MERRITT, Bankruptcy Counsel to Debtor, and files this, his motion for leave to withdraw as counsel to Debtor, JODI THOMAS-SHINN, and in support thereof states that irreconcilable differences have arisen which conflicts necessitate the withdrawal from representation of Debtor in this matter.

WHEREFORE, KEITH P. MERRITT, respectfully requests that the Court enter its order

1. permitting him to withdraw from representing the above-mentioned Debtor;
2. relieving him from further responsibility in this matter;
3. directing all further court papers to Debtor, JODI THOMAS-SHINN, 3800 Levins Road, Mulberry, FL 33860, E-mail: jodishinn3@gmail.com, who has subscribed to DeBN electronic noticing; and

4. awarding attorneys' fees and costs for preparing and attending the hearing upon this motion without prejudice to attorneys' fees and costs due the undersigned from Debtor.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the forgoing has been furnished electronically or by U.S. Mail on this 3rd day of July 2018, to Office of the U.S. Trustee, Timberlake Annex, 501 E. Polk St., Ste. 1200, Tampa, FL 33602; Jon Waage, P O Box 25001, Bradenton, FL 34206-5001 and Jodi Thomas-Shinn, 3800 Levins Road, Mulberry, FL 33860E-mail: jodishinn3@gmail.com.

/s/ Keith P. Merritt
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